

EXHIBIT A

1 IN THE UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF ILLINOIS
3 EASTERN DIVISION

3 COMMITTEE FOR A FAIR AND)
4 BALANCED MAP, JUDY BIGGERT,)
5 ROBERT J. DOLD, RANDY HULTGREN,)
6 ADAM KINZINGER, DONALD)
7 MANZULLO, PETER ROSKAM BOBBY)
8 SCHILLING, AARON SCHOCK, JOHN)
9 M. SHIMKUS, JOE WALSH, RALPH)
10 RANGEL, LOU SANDOVAL, LUIS)
11 SANABRIA, MICHELLE CABALLERO,)
12 EDMUND BREZINSKI, and LAURA)
13 WAXWEILER,)
14)

15 Plaintiffs,)

16) No.
17) 1:11-CV-050065

18 ILLINOIS STATE BOARD OF)
19 ELECTIONS, WILLIAM M.)
20 MCGUFFAGE, JESSE F. SMART,)
21 BRYAN A. SCHNEIDER, BETTY J.)
22 COFFRIN, HARROLD D. BYERS,)
23 JUDITH C. RICE, CHARLES W.)
24 SCHOLZ, and ERNEST L. GOWEN,)
)

 Defendants.)

16 The deposition of DONALD MANZULLO, called
17 by the defendant for examination pursuant to notice
18 and pursuant to the Rules of Civil Procedure for the
19 United States District Courts pertaining to the
20 taking of depositions, taken before Amy M. Spee, a
21 notary public within and for the County of Cook and
22 State of Illinois, at 70 West Madison Street, 55th
23 Floor, Chicago, Illinois, on the 7th day of October
24 2011.

1 APPEARANCES:

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9 POWER, ROGERS & SMITH, P.C., by
10 MR. DEVON C. BRUCE
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16 for the defendants.

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1 I N D E X

2 Witness: Page

3 DONALD MANZULLO

4 Examination by:

5 Mr. Bruce 4

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9 E X H I B I T S

10 Number Page

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1 and it came out just a few hours before it was voted
2 on. How could you comment on something that you
3 can't see.

4 Q Can I have my question --

5 A I had no idea that this would ever happen
6 to my district. It's always been up against the
7 Mississippi river, always gone western to the --
8 always gone to the east and Rockford has never been
9 divided. I had no idea, no inclination anybody would
10 be that cruel and divide that city.

11 Q Have you ever spoken to the mayor much
12 Rockford?

13 A Yes.

14 Q And what has the mayor of Rockford --

15 A Easy absolutely upset over this.

16 Q So mayor more see?

17 A Mayor more see is out raged over it because
18 he knows the work I have done for that city.

19 Q When did Mr. Mayor Morrissey tell you that
20 he was out raged about the division of Rockford into
21 two Congressional districts?

22 A Well, it would have been after the map came
23 out. I can't tell you when and where but I did
24 personally talk to him, he was very upset.

1 Q Tell me his exact words?

2 A I can't remember his exact words.

3 Q Okay.

4 A But he was out raged. He was very upset
5 and so is Scott Christianson, who is the chair of
6 county board.

7 Q Now, I think we digressed. I simply asked
8 you, did you ever send anyone on your behalf to any
9 of the redistricting committee hearings?

10 MS. LIGHTFOOT: And that's been asked and
11 answered.

12 BY MR. BRUCE:

13 Q Go ahead you can answer, congressman?

14 A No.

15 Q Okay. And when did you first retain
16 counsel to represent you in the redistricting
17 process?

18 MS. LIGHTFOOT: Objection. Relevance.

19 THE WITNESS: I don't know.

20 BY MR. BRUCE:

21 Q Well, was it before or after the map was
22 passed?

23 MS. LIGHTFOOT: Objection. Relevance.

24 THE WITNESS: I think it was before, but...